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EDWARD BENNETT WILLIAMS (1920-1988)
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December 11, 2018

VIA ECF

The Honorable Henry Pitman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.*,
Civil Action No. 1:17-cv-07417-VM-HBP**

Dear Judge Pitman:

I write on behalf of Plaintiff Coventry Capital US LLC (“Coventry Capital”) regarding the schedule in this case. By way of background, discovery in this matter has been stalled by Defendants’ refusal to produce relevant documents within their possession, custody, or control that are nominally held by their UK and Guernsey affiliates. This includes the business emails of Messrs. Patel and Piscaer. In light of this obstruction, Coventry Capital moved for sanctions against Messrs. Patel and Piscaer, and to compel Defendant EEA Life Settlements, Inc. (“EEA, Inc.”) to produce documents within its possession, custody, or control. *See* Dkt. No. 66. Following a decision on those motions, Coventry Capital may also renew its February 8, 2018 motion to compel, as contemplated in the Court’s March 29, 2018 order.

Meanwhile, in September 2018, Coventry Capital learned that EEA, Inc. was offering for sale the entire portfolio of life insurance policies that are the subject of this case. Coventry Capital therefore moved for a preliminary injunction. That motion was held in abeyance while the parties explored the possibility of settling this case. As set forth in Coventry Capital’s December 7, 2018 letter to Judge Marrero, however, Defendants have refused Coventry Capital’s repeated requests for basic, updated information about the underlying portfolio of life insurance policies—the composition and economics of which have changed materially since the parties’ dealings in 2017—as would be necessary to allow substantive settlement discussions to begin. On December 7, 2018, Coventry Capital informed Judge Marrero that further requests would not be productive.

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Coventry Capital has consistently maintained its desire to move this case forward as quickly as possible. The unresolved disputes concerning the scope of discovery in this matter, however, preclude the parties from proceeding with document discovery or depositions. Coventry Capital therefore reluctantly proposes an extension of the current schedule, as follows:

Event	Current Date¹	Proposed Date
Requests for Admission to be served	December 17, 2018	April 15, 2019
Close of fact discovery	January 15, 2019	May 15, 2019
Expert reports due (for party bearing the burden of proof)	February 26, 2019	June 24, 2019
Rebuttal expert reports	March 26, 2019	July 24, 2019
Close of expert discovery	April 26, 2019	August 26, 2019
Deadline for parties to attend settlement conference	May 6, 2019	September 13, 2019

Coventry Capital has attempted to confer with counsel for Defendants concerning this revised schedule, but counsel has not been able to respond by the time of this letter. In light of the upcoming December 17, 2018 deadline for the service of Requests for Admission, Coventry Capital submits its proposed schedule for the Court's consideration now, with the hope that the parties will be able to agree on all of the new deadlines proposed above. We appreciate your attention to these matters and will be prepared to address them further, if helpful, at the Court's convenience.

Respectfully submitted,



Kenneth J. Brown

cc: Counsel of Record

¹ See Dkt. No. 78 (Aug. 3, 2018 Order).